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*Attorneys for Defendant*

*Samsung Electronics America, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

HALEY WILLIAMS, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

SAMSUNG ELECTRONICS  
AMERICA, INC.,

Defendant.

No. 2:23-cv-00989-JMV-JRA

**NOTICE OF DEFENDANT  
SAMSUNG ELECTRONICS  
AMERICA, INC.'S MOTION TO  
DISMISS PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

**ORAL ARGUMENT  
REQUESTED**

**PLEASE TAKE NOTICE** that Defendant Samsung Electronics America, Inc. (“SEA”) shall move before the Honorable John Michael Vazquez, U.S.D.J., at the United States District Court for the District of New Jersey, Newark, New Jersey, on October 2, 2023, at 9:00 a.m. or at such other date and time as set by the Court, for an Order dismissing Plaintiff Haley Williams’ First Amended Complaint in its entirety and with prejudice.

**PLEASE TAKE FURTHER NOTICE** that in support of its motion, SEA will rely upon the Brief, Certifications of David Jay and Nicole Cantwell with exhibits, and Proposed Order submitted herewith. This motion is submitted pursuant to the schedule set forth in the Consent Order entered by the Court on June 13, 2023. (Dkt. 25.)

**PLEASE TAKE FURTHER NOTICE** that SEA reserves the right to compel arbitration of the claims of absent putative class members or named plaintiffs not yet added.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to L. Civ. R. 78.1(b), SEA requests oral argument on this motion.

Dated: July 17, 2023

By: /s/ David Jay  
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